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February 20, 2004

Carole J. Washburn, Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

**RE: UT-040015 – Rulemaking to consider changes to Chapter 480-120 WAC, Chapter 480-80 WAC and Chapter 480-122 WAC**

Dear Ms. Washburn:

AT&T, on behalf of AT&T Communications of the Pacific Northwest, Inc., TCG Seattle and TCG Oregon, appreciates the opportunity to submit written comments in Docket UT-040015 and plans to participate in the March 11, 2004 stakeholder meeting.

While working to implement the telecommunications rules that became effective July 1, 2003, AT&T identified several rules that have proven to be problematic. AT&T has addressed these issues with Staff and many of these rules are contained in the list for review incorporated in the Commission's rulemaking notice. However, there are two rules that were not included in the Commission's Notice, which AT&T believes, should be addressed in this forum as well. The rules are WAC 480-120-133, Response time for calls to business office and repair centers during regular business office hours and WAC 480-120-439, service quality performance reports.

WAC 480-120-133, Response time for calls to business office and repair centers during regular business office hours. The purpose of this rule is two fold; first to make sure that calls are handled in an efficient manner so that customers do not have to endure long periods on hold. Secondly, to ensure that consumers have an option to opt out to a live representative so that their inquiry can be handled promptly. AT&T believes that both of these goals are important, but found that strict adherence to the existing standards results in a negative experience for our customers. AT&T's business office model is based on the belief that customers are better served by representatives who specialize in a specific services' needs. Having extensive knowledge of a given service allows representatives to handle customer inquiries, fulfill requests and resolve customer problems more promptly and accurately.

In order for its business office model to be successful, AT&T must ensure that customer calls are initially routed to the office that handles that specific service. Because AT&T offers an array of services (e.g., residence, business, local service, customer calling features, toll plans, and internet) initial sorting to identify the appropriate office to route a customer's call may take longer than the sixty seconds defined in current rule. If AT&T were to offer an opt-out at the current sixty second mark, AT&T's process could sent customer calls to an office that may not be able to efficiently handle their account. In that instance, the customer would have to be transferred into another queue for their particular service.

In today's competitive environment, it is essential that AT&T provide its customers with a quality experience or risk losing them to competitors. Subjecting customers to unnecessary transfers or to representatives who are unable to help them does not result in better customer service and therefore does not meet the Commission's underlying goal in adopting this rule. Rather, it merely serves to frustrate customers. In discussions with Staff, AT&T has agreed to develop a proposed rule prior to the March 11 stakeholder meeting that accommodates current technology while still ensuring reasonable customer service. AT&T hopes to discuss its proposed rule at the stakeholder meeting.

WAC 480-120-439, Quality of Service Performance reports. Recent events have brought to light the fact that the Commission interprets this section to apply to competitively classified companies as well incumbent local exchange companies. AT&T sees no need for this rule's application to competitors and has identified ample legal support for its application only to incumbents (and perhaps then only in certain circumstances). Thus, AT&T seeks an opportunity to discuss this rule as well with the stakeholders.

Based upon the discussion above, AT&T respectfully requests the Commission to add these two rules to the list of rules to be addressed during the Rulemaking process. Please contact me if you have questions or concerns.

Sincerely,

Mary M. Taylor  
Assistant State Manager